



DAMES & MOORE

A PROFESSIONAL LIMITED PARTNERSHIP

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November 1, 1989

Gene M. Baker
Vice President, Operations
Gulf Resources & Chemical Corporation
505 Front Avenue, Suite 303
P.O. Box 2199
Coeur d'Alene, Idaho 83814

**Bunker Hill Superfund Site/
Industrial Complex Immediate Removal**

Dear Mr. Baker:

Dames & Moore has reviewed the Administrative Unilateral Order issued by USEPA on October 24, 1989 and its attachments. As you requested, we have prepared preliminary work plans to address the identified concerns with the copper dross flue dust pile, sulfuric acid tank, and existing asbestos deterioration and debris. Copies of those plans (including schedules) are attached.

We look forward to the opportunity to discuss these preliminary plans with you.

Sincerely yours,

DAMES & MOORE

Gerald L. Lamb

Gerald L. Lamb
Partner, Ltd.

JL:kh

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07.01.00.00-0006

TASK 1

WORK PLAN FOR STABILIZATION/CONTAINMENT OF THE COPPER DROSS FLUE DUST PILE

Measures will include:

- a) Consolidation of the material pile
- b) Improve/construct surface water drainage and run on diversion at the containment area
- c) Install appropriate cover to limit windblown dust and infiltration or erosion by precipitation
- d) Install appropriate fencing and posting to control access

A list of specific tasks is as follows:

TASK 1.1 - PREPARE TASK-SPECIFIC SAFETY PLAN

TASK 1.2 - INSTALL FENCE/PLACARDS

TASK 1.3 - EVALUATE CONTAINMENT/STABILIZATION ALTERNATIVES
AND DESIGN REMEDIATION

TASK 1.4 - SUBCONTRACT/EQUIPMENT PROCUREMENT

TASK 1.5 - CONSTRUCTION/IMPLEMENTATION

SCHEDULE: A preliminary schedule for the implementation is attached. The schedule assumes the EPA on-scene coordinator provides immediate on site review/approval of Tasks as necessary.

wkpln

time delays only for weather constraints =
Chris Webb suggests sealant vs plastic liner
soil

TASK 2

WORK PLAN FOR CONTAINMENT OF SULFRIC ACID TANK AND TANK BOTTOM SLUDGE

Measures will include:

- a) Establish adequate secondary containment
- b) Assess the integrity of present containment
- c) Locate alternate, stable containment if necessary
- d) Transfer acid and tank bottom sludge if necessary
- e) Evaluate permanent disposal options

A list of specific tasks is as follows:

TASK 2.1 - PREPARE TASK-SPECIFIC SAFETY PLAN

TASK 2.2 - INSTALL PLACARDS

TASK 2.3 - EVALUATE PRIMARY/SECONDARY CONTAINMENT
ALTERNATIVES

TASK 2.4 - SUBCONTRACT/EQUIPMENT PROCUREMENT

TASK 2.5 - CONSTRUCTION/IMPLEMENTATION

TASK 2.6 - EVALUATE PERMANENT DISPOSAL OPTIONS

SCHEDULE: A preliminary schedule for the implementation is attached. The schedule assumes the EPA on-scene coordinator provides immediate on site review/approval of Tasks as necessary.

wkpln

56,000 GAL of acid sludge
6500 gal (about 10 tanks)
we are looking at Baker Tanks or take to disposal
could be pumped into tankers & haul to disposal
also remove dry sludge in bottom of open tanks

EPA has done waste characterization done already
2 facilities would want waste neutralized before accepting

TASK 3

WORK PLAN FOR ASBESTOS CONTAMINATION RESPONSE

Abate asbestos contamination at the five areas identified in paragraph 46. Measures will include:

- a) Encapsulation of damaged asbestos containing materials (ACM) where feasible
- b) Removal of ACM where encapsulation is not feasible
- c) Removal and disposal of stored ACM
- d) Removal of visibly contaminated soil

A list of specific tasks is as follows:

TASK 3.1 - REVIEW AVAILABLE INFORMATION REGARDING THE QUANTITIES AND CONDITION OF FRIABLE ASBESTOS CONTAINING MATERIALS AS IDENTIFIED IN PARAGRAPH 46

TASK 3.2 - DEVELOP TASK-SPECIFIC HEALTH AND SAFETY PLAN

TASK 3.3 - DEVELOP DETAILED ASBESTOS ABATEMENT SPECIFICATIONS

TASK 3.4 - AWARD CONTRACT TO QUALIFIED ASBESTOS ABATEMENT SUBCONTRACTOR(S)

TASK 3.5 - CONSTRUCTION/IMPLEMENTATION

SCHEDULE: A preliminary schedule for the implementation of Paragraph 46 of Order is attached. The schedule assumes the EPA on-scene coordinator provides immediate onsite review/approval of Tasks as necessary.

wkpln